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7 VALLEY HEALTH SYSTEM, LLC d/b/a SUMMERLIN
MEDICAL CENTER
8

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 JOSEPH ANORUO,
13 Plaintiff,

14 vs.

15 VALLEY HEALTH SYSTEM, LLC
16 d/b/a SUMMERLIN HOSPITAL AND
MEDICAL CENTER,
17 Defendants.

Case No. 2:18-cv-00105-MMD-NJK

**DEFENDANT'S MOTION TO
RESCHEDULE EARLY NEUTRAL
EVALUATION SESSION
(FIRST REQUEST)**

18
19 Defendant VALLEY HEALTH SYSTEM, LLC d/b/a SUMMERLIN HOSPITAL AND
20 MEDICAL CENTER ("Summerlin Hospital" or "Defendant")¹, by and through its attorneys of
21 record, Littler Mendelson, P.C., hereby requests that Magistrate Judge Peggy A. Leen reschedule the
22 Early Neutral Evaluation Session ("ENE") currently set for 9:30 a.m. on March 28, 2018 (**ECF No.**
23 **8**) due to Defendant's unavailability on that date as defense counsel both have pre-existing
24 commitments out of the office that week. Defendant requests that the Court reschedule the ENE for
25 the next available time with the exception of Defendant's conflicts on March 26-30 and April 24-27.

26 The undersigned counsel attempted to confer with Plaintiff regarding this request on January
27

28 ¹ Valley Health System, LLC is incorrectly named in this lawsuit as it did not employ Plaintiff; Summerlin Hospital Medical Center, LLC is the correct entity.

1 31, 2018. No response was received. This is the first request by Defendant to reschedule the ENE
2 and such request is not sought for any improper purpose or other reason of delay.

3 Dated: February 2, 2018.

4 Respectfully submitted,


5 /s/ Kaitlyn M. Burke, Esq.
6 WENDY MEDURA KRINCEK, ESQ.
7 KAITLYN M. BURKE, ESQ.
8 Littler Mendelson, P.C.

9 Attorneys for Defendant
10 VALLEY HEALTH SYSTEM, LLC d/b/a
11 SUMMERLIN HOSPITAL AND MEDICAL
12 CENTER

13 The plaintiff having not opposed the defendant's request to continue the ENE,

14 **IT IS ORDERED** that the ENE Conference currently scheduled for March 28, 2018, at
15 9:30 a.m., is VACATED and CONTINUED to Thursday, April 5, 2018, at 1:30 p.m., in
16 Chambers Room 3071. Confidential ENE statements shall be due to Chambers no later
17 than 4:00 p.m., March 29, 2018. All other instructions within the original Order Scheduling
18 Early Neutral Evaluation Session (ECF No. 8) shall remain in effect.

19 Dated: February 21, 2018

20 
21 Peggy A. Leen
22 United States Magistrate Judge
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1 **PROOF OF SERVICE**

2 I am a resident of the State of Nevada, over the age of eighteen years, and not a party to the
3 within action. My business address is 3960 Howard Hughes Parkway, Suite 300, Las Vegas, Nevada
4 89169-5937. On February 2, 2018, I served the within document(s):

5 **DEFENDANT'S MOTION TO RESCHEDULE EARLY**
6 **NEUTRAL EVALUATION SESSION**

- 7 ☒ By **United States Mail** – a true copy of the document(s) listed above for collection and
8 mailing following the firm's ordinary business practice in a sealed envelope with postage
thereon fully prepaid for deposit in the United States mail at Las Vegas, Nevada addressed as
set forth below.
- 9 ☒ By **CM/ECF Filing** – Pursuant to FRCP 5(b)(3) and LR 5-4, the above-referenced document
10 was electronically filed and served upon the parties listed below through the Court's Case
Management and Electronic Case Filing (CM/ECF) system:

11
12 Dr. Joseph Anoruo
13 6322 Isabel Cove Avenue
Las Vegas, NV 89139

14 *Pro Se Plaintiff*

15
16 I am readily familiar with the firm's practice of collection and processing correspondence for
17 mailing and for shipping via overnight delivery service. Under that practice it would be deposited
18 with the U.S. Postal Service or if an overnight delivery service shipment, deposited in an overnight
19 delivery service pick-up box or office on the same day with postage or fees thereon fully prepaid in
20 the ordinary course of business.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed on
22 February 2, 2018, at Las Vegas, Nevada.

23 /s/ Erin J. Melwak
24 Erin Melwak

25 Firmwide:152601034.1 069080.1107